

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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Jane Best-Simpson,

Plaintiff,

-against-

NEW YORK ORGAN DONOR NETWORK,
ELAINE BERG, *Individually and in her
Professional Capacity*, MICHELE CLAYTON
LUCAS, *Individually and in her Professional
Capacity*, Julia Rivera, *Individually and in her
Professional Capacity* and Martin Woolf
Individually and in his Professional Capacity,
ROBERT GOSSEEN, GALLAGHER, GOSSEEN,
FALLER & CROWLEY, THE NEW YORK CITY
COMMISSION ON HUMAN RIGHTS, PATRICIA
GATLING, *Individually and in her Professional
Capacity*; MR. RAYMOND WAYNE, *Individually
and in his Professional Capacity*; MS. LANNY
ALEXANDER, *Individually and in her Professional
Capacity* and MR. CLIFF MULQUEEN,
Individually and in his Professional Capacity,

Defendants.
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**NOTICE OF MOTION
TO DISMISS**

07 CV 2683 (BSJ)(AJP)


Pro Se Case

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law in Support of Defendants' Motion to Dismiss, dated November 27, 2007, and upon the complaint and all prior proceedings herein, the undersigned will move this Court at the United States Courthouse for the Southern District of New York, 500 Pearl Street, New York New York, on a date and time to be designated by the Court, for an order pursuant to Rule 12(b)(6) and Rule 9(b) of the Federal Rules of Civil Procedure dismissing all of the claims against the HRC Defendants together with such other and further relief as the Court deems just, fair and equitable.

PLEASE TAKE FURTHER NOTICE, that in accordance with S.D.N.Y. Civil Rule 6.1(b), opposition papers must be served on the undersigned within ten (10) business days after service of this motion and that reply papers shall be served within five (5) business days after service of plaintiff's answering papers.

Dated: New York, New York
November 28, 2007

MICHAEL A. CARDOZO
Corporation Counsel of the
City of New York
Attorney for Defendants The New York City
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Raymond Wayne, Lanny Alexander, and Cliff
Mulqueen
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By: 
Eric Proshansky (EP1777)
William H. Miller (WM4658)
Assistants Corporation Counsel

To:
Jane Best-Simpson
Plaintiff *Pro Se*
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Via ECF
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Seth W. Berman
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